

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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Civil Action No. 05 11317 NMG

U.S. DISTRICT COURT
DISTRICT OF MASS.

Bienvenido I. Lugo-Merchant

Plaintiff,

v.

**Peter Tsickritzis, Kevin Kingston,
and United Liquors Limited et al.,**
Defendant

INITIAL DISCLOSURE OF PLAINTIFF, LOCAL RULE 26.2, FRCP 26(a)(1)

Plaintiff, Bienvenido I. Lugo-Merchant, discloses the following:

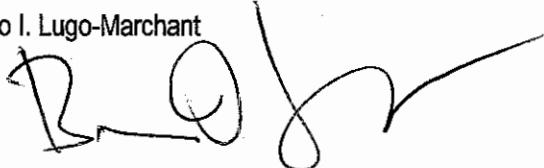
1. The person(s) who Plaintiff knows or believes to have discoverable information relevant to the Plaintiff's Complaint:
 - a. Self- Plaintiff remembers his having worked for the Defendants, offers of training, offers of promotion, demotion of desirable work, denial of promotion after asking for explanation from Defendants, harassment, medical plan cancellation, denial of light work accommodation, subjection to hostile work environment, retaliatory actions, and discrimination for unlawful and racists reasons.
 - b. MCAD/EEOC- MCAD/EEOC have documents related to the Plaintiff
 - c. Defendants- Defendants (as defined by Defendants in their **Initial Disclosure of Defendants**; section 1. a-g) have documents related to the Plaintiff having worked for the Defendants and his MCAD/EEOC claims. Also, Laura Stec, Sara Corbett (Sarah Corbett, Sarah Corbet; administrative assistant), Howie [office assistant], Jonathan Barry [has knowledge about the claim], James Tye [has some knowledge about the claim], Timothy Bishop [supervisor], Mark McGill [secretary], Gary Keimach [had a conversation with the Plaintiff] and other employees and former employees not remembered by their complete names.
 - d. John Moran's Office, Esq.
 - i. Represented the Plaintiff in a workers comp' claim.
 - e. Dr. John Doherty, MD.
 - i. Dr. Doherty has some knowledge about the Plaintiff
 - f. Dr. Rina Bloch, MD., New England Medical Center

- i. Dr. Bloch has some knowledge about the Plaintiff.
- g. Dr. Robert Baritz, MD
 - i. Pleasant Street, Brockton, MA 02301; Dr. Baritz has some knowledge about the Plaintiff
- h. Hale and Dorr, LLP- Hale and Dorr, LLP represented the Defendants at MCAD/EEOC in relation with the Plaintiff's claim.
- i. Horizon Beverages ["HB"] 80 Stockwell Dr., Avon, MA 02322
 - i. Some employees at HB asked the Plaintiff about the Defendants and commented to him that the Defendants divulged secrets to HB regarding legal actions initiated by the Plaintiff.

2. Plaintiff further discloses that in his possession are documents related to this matter, including:
 - a. Plaintiff's personnel file [excerpts sent by Defendants].
 - b. Documents related to Plaintiff's charge of discrimination filed with the MCAD/EEOC.
3. Plaintiff discloses that if some new documents, facts or persons, as defined by the Defendants, appear then Plaintiff will communicate it to the Defendants as soon as possible.
4. At the time of these writings Plaintiff has no experts.

Respectfully submitted, Bienvenido I. Lugo-Merchant

Pro se, in forma pauperis.



CERTIFICATE OF SERVICE

I hereby certify that a true copy of this document was served upon the defendant's counsel, JACKSON LEWIS, by first class mail, postage paid and by fax on Friday, July 21, 2006